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11 THOMAS A. DIBIASE

12 **UNITED STATES DISTRICT COURT**

13 **FOR THE DISTRICT OF NEVADA**

14 Righthaven LLC, a Nevada limited-liability) CASE NO.: 2:10-cv-1343 RLH PAL
15 company,)
Plaintiff,)
v.)
THOMAS A. DIBIASE, an individual,)
Defendant.)

20 THOMAS A. DIBIASE, an individual,)
Counterclaimant,)
v.)
Righthaven LLC, a Nevada Limited-)
Liability Company,)
Counter-defendant.)

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28)
DECLARATION OF LARA PEARSON

Declaration of Lara Pearson

1. My name is Lara Pearson. I am a duly licensed attorney in Nevada and a member of the Nevada bar in good standing. If asked to testify, I could testify competently to the matters set forth herein.

2. I was appointed as court-ordered receiver for Righthaven LLC on December 11, 2012 (*Righthaven v. Hoehn*, Case 2:11-cv-00050-PMP-RJJ, Dkt. 66), and served through October 9, 2012. On October 9, 2012, Judge Pro substituted Ryan Hamilton as receiver (*Hoehn*, Dkt. 109).

3. Righthaven has never voluntarily transferred possession of any assets to me, despite my efforts to obtain the assets that could be sold to help satisfy Righthaven's debts.

4. The only assets transferred to me were intangible assets, which were judicially transferred without any cooperation from Righthaven.

5. Righthaven has not informed me where its tangible assets are located.

6. I do not know where Righthaven's tangible assets are located.

7. I have never had possession, custody or control over Righthaven's tangible assets.

8. In my observation and experience as receiver, the largest obstacle in completing the receivership is Righthaven, which has been uncooperative throughout my entire tenure as receiver.

DATED: October 10, 2012

Respectfully submitted,

Lara Pearson, Esq.
Exemplar Law, LLC
Receiver for Judgment Debtor
Righthaven LLC